

**MEMO ENDORSED**



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**BY FACSIMILE**

Honorable James C. Francis IV  
United States Magistrate Judge  
United States Courthouse  
Southern District of New York  
500 Pearl Street, Room 1960  
New York, NY 10007

**USDC SDNY  
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May 31, 2006

Re: Concepcion v. City of New York, et al. 05-CV-8501 (KMK) (JCF)

Dear Judge Francis:

On behalf of plaintiff and defendants, I write to request a modification of the deadlines for items 5-18 in the Case Management Order ("CMO") in this case. The parties currently are focused on the consolidated witness depositions, which are continuing. Both sides need additional time for other discovery including depositions of non-consolidated defense witnesses, plaintiff and third party witnesses. Accordingly, plaintiff and defendants jointly request that the Court grant a 3-month extension on the deadlines in the CMO for items 5-18. If this meets with your approval, would you please "so order" it? Thank you.

Very truly yours,

*Jeffrey A. Dougherty*  
Jeffrey A. Dougherty

cc: Karen Wohlforth, Esq. (by Facsimile)  
Zelda Stewart, Esq. (by Facsimile)

6/1/06  
Application granted.  
SO ORDERED.  
*James C. Francis IV*  
USM J